

Hazardous Waste Management Commission Report

July-Dec 2017



Quarterly Report



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Hazardous Waste Management Commissioners

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"The goal of the Hazardous Waste Program is to protect human health and the environment from threats posed by hazardous waste."

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Past issues of the Hazardous Waste Management Commission Report are available online at dnr.mo.gov/env/hwp/commission/quarterlyreport.htm.



**Missouri Department of Natural Resources
Hazardous Waste Program**

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Missouri Department of Natural Resources - Hazardous Waste Program

Sites in the BROWNFIELDS/VOLUNTARY CLEANUP SECTION

Month	Active	Completed	Total
July 2017	243	848	1091
August 2017	244	850	1094
September 2017	246	851	1097
October 2017	245	851	1096
November 2017	248	852	1100
December 2017	229	870	1099

New Sites Received

JULY

Ambassador Cleaners, Ellisville
 Friendly Truck (Former), St. Louis
 Sarah Clayton Development, St. Louis
 Ballpark Village, St. Louis

AUGUST

Meramec Electrical Building (former), Cuba Daggett, St. Louis

SEPTEMBER

TJTRs LLC dba Woody's Grocery, Agency Kansas City 2, Kansas City
 Missouri City Power Plant (former), Missouri City
 Western Baptist Bible College, Kansas City
 St. Elizabeth Hospital (former), Hannibal

OCTOBER

Excelsior Leader Laundry (former), St. Louis

NOVEMBER

LaGrange School, La Grange
 Baumgartner Storage, St. Louis
 Wrink's Market, Lebanon
 Farlin Avenue Yard, St. Louis

DECEMBER

None

Sites Closed

JULY

Baker Petrolite/VWebster Groves - North Parcel OU, Webster Groves
Station G Apartments, St. Louis
Lee's Summit Hospital (former), Lee's Summit

AUGUST

Great Southern Wood Preserving (Buckner), Buckner
Ashland First Street Release, St. Louis

SEPTEMBER

Lewis & Clark Professional Building & Plaza, Jennings

OCTOBER

None

NOVEMBER

Southern Material Handling (former), Springfield

DECEMBER

East Locust Creek Building 2E03-A, Milan
East Locust Creek Building 2E03-E, Milan
East Locust Creek Building 3E07-A, Milan
East Locust Creek Building 3E07-B, Milan
East Locust Creek Building 3E07-C, Milan
East Locust Creek Building 3E07-D, Milan
East Locust Creek Building 3E07-E, Milan
East Locust Creek Building 3E09-A, Milan
East Locust Creek Building 3E10-A, Milan
East Locust Creek Building 3E10-B, Milan
East Locust Creek Building 3E11-A, Milan
East Locust Creek Building 3E11-C, Milan
East Locust Creek Building 3E11-E, Milan
East Locust Creek Building 3E11-J, Milan
East Locust Creek Building 3E15-A, Milan
East Locust Creek Building 4E05-A, Pollock
East Locust Creek Building 4E10-A, Pollock 200 Block Commons, Joplin

DERT Fund

On Aug. 28, 2017, the Drycleaning Environmental Response Trust (DERT) Fund and its related statutes and regulations sunset/expired. Since May 30, 2006, when the DERT Fund went into full operation, 42 sites enrolled into the fund for cleanup oversight; 16 sites received a certificate of completion; and \$3,187,819 in eligible costs were reimbursed to the fund's participants.

2017 - A Year in Review

Each year, the Permits Section coordinates with EPA to prioritize activities at hazardous waste facilities subject to the section's oversight. Together, the section and EPA agree on general activity goals. The Performance Partnership Grant Work Plan, an overarching plan that covers the department's air, water and hazardous waste programs, lists the section's general activity goals. The Permits Section, in coordination with EPA, also develops facility-specific future goals, which are contained in a related document called the Multi-Year Facility Planning Strategy. Together these two documents guide the section in planning resources and performing future hazardous waste permitting and corrective action activities.

The planning strategy is a living document and includes goals the section and EPA anticipate accomplishing if all staff positions are filled and all projects go relatively smoothly. Projected goals and project completion dates are routinely updated for various reasons, such as staff turnover and resources, facility bankruptcy, permit appeals, corrective action dispute resolution, investigation findings leading to additional work, public comments and intervening short-term priorities. The section routinely updates EPA on the status of the planning strategy goals and coordinates new projected completion dates for any delayed goals.

At the end of each federal fiscal year, the section prepares a report for EPA, documenting progress on all planned and unplanned activities during that fiscal year. The report focuses mainly on permitting, corrective action and groundwater inspection and evaluation activities. Despite ongoing reductions in federal grant funding, EPA continued to request the section take over as lead agency for certain permit and corrective action-related activities not previously identified in the grant work plan or the planning strategy. The following information is for federal fiscal year 17 and summarizes activities from Oct. 1, 2016, through Sept. 30, 2017.

Hazardous Waste Permitting Activities

The section coordinated internally and with EPA on individual project and task priorities for each facility. These priorities took into consideration the national hazardous waste permitting and corrective action goals established under the federal Government Performance and Results Act of 1993, as well as the short-term needs of our regulated facilities.

During federal fiscal year 17, the section completed many permit-related activities and permit modifications. Some of these activities were identified in the MYFPS, some were not. The section's permit modification activities were important to the operation and economic viability of our regulated facilities. EPA published a report in January 2016, Permit Modifications Report: Safeguarding the Environment in the Face of Changing Business Needs, which is available online at: epa.gov/hwpermitting/permit-modifications-report-safeguarding-environment-face-changing-business-needs. This report describes the changed nature of hazardous waste permitting work shifting to permit maintenance and modifications and highlights examples of significant permit modifications in Missouri. During federal fiscal year 17, the section completed the following permit-related activities:

- Issued two Missouri Hazardous Waste Management Facility Part I Permits in final form. The Lake City Army Ammunition Plant (Independence) permit is for hazardous waste treatment and storage. The BFI Missouri City Landfill (Missouri City) permit is for post-closure and corrective action. The BFI permit is the first of its kind in Missouri as it includes Remedial Action Plan provisions to build an on-site leachate/groundwater treatment plant.

- Issued the proposed final remedy and draft Missouri Hazardous Waste Management Facility Part I Permit for The Boeing Co.-Tract 1 facility (Hazelwood) for public review and comment during federal fiscal year 17; however, staff did not issue the permit in its final form until early federal fiscal year 18. This permit removed some property from the jurisdiction of the previous Part I Permit and requires Boeing to implement the approved final corrective action remedy and implement a facility-wide corrective action program.
- Issued one department-initiated permit modification (equivalent to a facility-initiated class 3 permit modification): Bannister Federal Complex (formerly the U.S. Department of Energy-Kansas City Plant). This was a “contingent” permit modification to ready the facility for implementing a modified final remedy once a portion of the permitted facility was transferred from the federal government to a private entity for redevelopment. The property transfer occurred on Nov. 15, 2017, following the early transfer sign-off by Governor Greitens.
- Issued five class 2 permit modifications
 - Issued one to BASF Corp.
 - Issued two to The Doe Run Co.
 - Issued one to EBV Explosives Environmental Co.
 - Issued one to Lone Star Industries Inc.
- Issued seven class 1 permit modifications with prior director approval. One request was denied.
- Issued 16 class 1 permit modifications without prior director approval.
- Issued six temporary authorizations.
 - Issued two to The Doe Run Co.
 - Issued two to EBV Explosives Environmental Co.
 - Issued one to Exide Technologies
 - Issued one to Hazmat Inc.

During federal fiscal year 17, the section continued to make progress towards reissuing 19 other hazardous waste permits and completing two closures with progress at various stages. Though not complete at the end of federal fiscal year 17, the section also worked on the following additional permit-modifications:

- Six class 3 permit modification requests
- Two class 2 permit modification requests
- 14 class 1 permit modifications requests with prior director approval
- Nine class 1 permit modification notifications without prior director approval

Corrective Action Activities

During federal fiscal year 17, work continued on many corrective action activities related to site investigation, monitoring and remediation. The following are some of the highlights.

No new RCRA Facility Assessment Reports were prepared or reviewed during federal fiscal year 17. However, the section worked proactively with Trioxy, a new proposed facility, during review of their

permit application to ensure no pre-existing contamination areas were located on property slated for permitting their operations.

The section continued its efforts to improve the corrective action process by implementing elements of the national corrective action Project LEAN framework and RCRA Facility Investigation Remedy Selection Track Toolkit. The toolkit represents a collection of principles and approaches that focus on identifying and eliminating non-value added activities in the corrective action process. The goal is to identify and eliminate process inefficiencies, barriers to progress and reduce costs, without compromising human health and the environment. Use of the LEAN framework and related tools continued at the former Zenith facility in Springfield, Omnium facility in St. Joseph and the former Amoco (now BP) Sugar Creek refinery in Kansas City.

Facility-proposed/department-approved interim measures to address corrective action issues were implemented at Dyno-Nobel, Holcim (US) Inc./Geocycle LLC and BFI Missouri City Landfill. The section also approved several other work plans and reports for incremental/phased work done in support of longer-term corrective action investigation and cleanup goals at several facilities.

During federal fiscal year 17, the section achieved the following national Government Performance and Results Act goals for corrective action:

One final remedy decision for Heritage Environmental Services LLC (Kansas City). Two final remedy construction completions, one for City Environmental Inc. (Kansas City) and one for Heritage Environmental Services LLC (Kansas City). Three corrective action performance standards attained (with or without controls) one each at City Environmental Inc. (Kansas City), Heritage Environmental Services LLC (Kansas City) and University of Missouri (Columbia).

As a way to show progress in protecting human health and the environment and meet the Government Performance and Results Act goals, EPA and the states developed the environmental indicator evaluation process. The two environmental indicators are “Current Human Exposures Under Control” and “Migration of Contaminated Groundwater Under Control.” These indicators evaluate current environmental conditions, whether people are currently being exposed to environmental contamination at unacceptable levels and whether any plume(s) of contaminated groundwater, if present, are expanding, stable or shrinking. A facility that fails to have an “affirmative” environmental indicator determination does not mean that human exposures or contaminated groundwater migration is occurring, but rather the facility has not been evaluated yet or more information is needed to make a determination.

During federal fiscal year 17, the section, in coordination with EPA, completed the following environmental indicator evaluations:

- Three human exposure environmental indicators: City Environmental Inc. (Kansas City), Heritage Environmental Services LLC (Kansas City) and Lone Star Industries Inc. (Cape Girardeau). Human exposures to contamination was determined to be under control at all three facilities.
- Three contaminated groundwater environmental indicators: City Environmental Inc. (Kansas City), Heritage Environmental Services LLC (Kansas City) and Lone Star Industries Inc. (Cape Girardeau). Contaminated groundwater migration was determined to be under control (or not present) at all three facilities.

Together, EPA and the states previously developed a format for facility ready for anticipated use determinations. The ready for anticipated use determinations document when facilities are ready for reuse, regardless of whether it is the current use or a future use. Before this can be declared, final remedies must be in place (or complete) and all institutional controls must be in place (i.e., an environmental covenant or other enforceable instrument limiting property activities and/or use). The section continued to prepare

determination documentation for facilities during the corrective action process. During federal fiscal year 17, the section completed an affirmative determination for Heritage Environmental Services LLC (Kansas City).

Groundwater Activities

Missouri negotiates with EPA, as part of the grant work plan, preparing groundwater evaluations at selected hazardous waste facilities. These evaluations are performed at post-closure and corrective action facilities with active groundwater monitoring programs. These evaluations come in two forms, the comprehensive groundwater monitoring evaluation and the groundwater operation and maintenance inspection. The evaluation is an overarching evaluation of the facility's groundwater monitoring systems and programs. The inspections, periodically performed as a follow-up to the evaluation, are focused on examining groundwater sampling plans, procedures and monitoring well maintenance issues. In each case, the section assesses compliance with the applicable groundwater monitoring regulations and permit or order conditions.

Five operation and inspection reports were historically scheduled during each federal fiscal year. Due to diminishing federal grant funding and a shift towards core program activities, this number was recently reduced to two reports per federal fiscal year. All fieldwork for the two reports scheduled for federal fiscal year 17 was completed. The associated reports were drafted but not finalized during federal fiscal year 17. Similar to prior years, the delays in report finalization were the result of staff turnover and competing priorities. During federal fiscal year 17, the section carried out advanced planning for the two reports scheduled for federal fiscal year 18.

The section routinely reviews groundwater monitoring reports submitted by our regulated facilities. These reviews are conducted either formally, using an internal checklist, or informally if significant issues are not present during report review. These reviews identify both minor and potentially significant issues related to report content or overall adequacy of the groundwater monitoring program. If significant issues are identified that might influence the representative nature of groundwater samples, data validity, regulatory compliance or project progress, those issues are conveyed to the facility when discovered, rather than waiting until the next report or evaluation. During federal fiscal year 17, the section completed eight formal and many informal groundwater monitoring report reviews.

Data Management Activities

The section tracks, both internally and externally, all section activities and accomplishments. External tracking is done through EPA's RCRAInfo database. EPA-required data is entered into RCRAInfo as soon as a milestone or goal is achieved and reported. As new data is entered, the section checks historical state and EPA data for accuracy. The section is responsible for correcting errors found in state and joint database entries. If errors are found in EPA's entries, corrections are forwarded to EPA's Missouri State Coordinator for EPA reconciliation.

During federal fiscal year 17, the Permits Section continued working with EPA's RCRAInfo team to resolve data quality issues related to the RCRAInfo data quality initiative. The section also worked with EPA to implement entering permit modification data into RCRAInfo. EPA recently decided to make permit modification entries into RCRAInfo a national requirement and established those modifications as an annual commitment system "indicator." This was done so states would get national credit for permit modification work and help provide support for continued RCRA program funding on the national level.

The section also worked with ASTSWMO Program Information Task Force as a task force member on data quality and RCRAInfo Version 6.0 development and implementation issues.

Financial Assurance Activities

Owners and operators of facilities actively handling hazardous waste as an interim status or permitted treatment, storage or disposal facility, and facilities with closure, post-closure care or corrective action obligations under other regulatory instruments (i.e., consent orders), are required to meet certain financial assurance and third party liability requirements. This ensures they will have enough funds set aside to close their facility, clean up any releases and compensate third parties for bodily injury or property damage resulting from those releases, even if the facility declares bankruptcy. The facility owners and operators submit closure, post-closure or corrective action plans to the department, as applicable, with cost estimates based on those plans and financial assurance instrument documents sufficient to cover those estimated costs.

Throughout the year, the section monitors the financial health of facilities required to provide financial assurance. The section also conducts annual financial assurance reviews to make sure enough funding is available to cover the cost estimates for their activities. During federal fiscal year 17, the section conducted 93 financial reviews, which included three resource recovery facilities in addition to our hazardous waste treatment storage and disposal facilities.

Other Activities

The section provided technical support to other Hazardous Waste Program sections and the Division of Environmental Quality on several occasions, regarding multiple sites and issues. This support included activities related to technical document review, site characterization, conceptual site models, groundwater plume stability evaluation, groundwater monitoring system adequacy, remedy design, groundwater data interpretation and natural resource damage evaluation.

Significant time and resources were spent on several activities related to the Department of Energy/General Services Administration Bannister Federal Complex. The section approved “contingent” changes to the approved final remedy and hazardous waste permit in preparing for transferring part of the federal complex property to a private developer before the facility cleanup is complete. These changes became effective during early federal fiscal year 18, when the property and hazardous waste permit was transferred to the private developer. Significant time was spent keeping the public informed of the pending property transfer and redevelopment project.

Time and resources continued to be devoted to following up on facility bankruptcy issues. Tasks included review, approval and reconciliation of proposed expenditures of trust fund monies recovered during bankruptcy and litigation proceedings to perform facility investigations, maintenance and monitoring. Section staff also provided post-bankruptcy information and technical support to department managers, legal staff and EPA regarding bankruptcy-related issues at the following facilities:

- City Environmental Inc. - Kansas City
- The Doe Run Co. Glover Smelter - Glover
- Greenfield Environmental Trust LLC (formerly Tronox) - Kansas City
- Greenfield Environmental Trust LLC (formerly Tronox) - Springfield
- Omnium LLC - St. Joseph
- West Star Environmental Inc. - Kingsville

The section also provided technical support to the department's Natural Resource Damage efforts. Tasks periodically included reviewing reports; participating in scoping meetings; participating in technical conference calls; creating geographic information system based maps; and preparing habitat equivalency analyses.

Section staff routinely participated in state and national work groups and teleconferences, including:

- ASTSWMO Program Information Management Task Force
- EPA Groundwater Forum
- RCRA Financial Assurance Work Group
- Monthly RCRA Permit Writers Teleconferences
- Monthly RCRA Combustion Teleconferences
- Monthly RCRA Reuse and Brownfields Prevention Teleconferences
- Monthly RCRA Corrective Action Teleconferences
- Monthly RCRA Subpart X Teleconferences
- Monthly Regulatory Information Network Teleconferences
- RCRAInfo Change Management Process Financial Assurance Expert and Corrective Action Work Groups
- RCRAInfo Data Work Group

Permit Modifications List Available Online New Article

The department invites the public to review the list of completed hazardous waste permit modifications for the 2017 calendar year. The permit modification list for calendar year 2017 (and previous years) is available online at dnr.mo.gov/env/hwp/permits/publications.

Businesses actively treating, storing (for longer than allowed by the hazardous waste generator regulations) or disposing hazardous waste in Missouri must have a hazardous waste permit. These permits contain operating and closure requirements for facilities actively managing hazardous waste. These permits may also contain post-closure, corrective action and financial assurance requirements. The department or facility can make changes to the permit throughout its life, allowing the facility to change or improve its operations or respond to new or changed regulatory requirements. Facility-initiated permit modifications are classified as Class 1, 2 or 3, depending on how much they change the permit conditions. Department-initiated permit modifications are not broken into classes but are administratively similar to facility-initiated Class 3 permit modifications. Additional information and examples of significant permit modifications in Missouri are highlighted in the EPA publication, Permit Modifications Report: Safeguarding the Environment in the Face of Changing Business Needs, available online at epa.gov/hwpermitting/permit-modifications-report-safeguarding-environment-face-changing-business-needs.

Regional Office Hazardous Waste Compliance Efforts

- Conducted 200 hazardous waste generator compliance inspections:
 - 41 at large quantity generators
 - 90 at small quantity generators
 - 56 at conditionally exempt small quantity generators
 - Five focused compliance inspections
 - Four E-waste facilities
 - Four resource recovery facilities
- Staff issued 53 letters of warning and four notices of violation requiring actions to correct violations cited during the 200 inspections conducted. Of the four notices issued, one included a referral to consider further enforcement action.
- Staff conducted four compliance assistance visits at hazardous waste generators.
- Staff received 100 citizen concerns regarding hazardous waste issues during July 1, 2017; through Dec. 31, 2017. They conducted field investigations on 102 citizen concerns during the same time period.

Underground Storage Tank Compliance and Technology Unit

Underground Storage Tank Rules

The new underground storage tank rules, which include Missouri's version of the federal UST regulations, were finalized and effective May 2017. Since then, the first of the new requirements has gone into effect: double-walled systems are now required for new construction. While there have been a lot of questions and technical assistance, staff addressed most of the concerns before construction has begun; as such, the implementation is going rather smoothly (albeit a bit time-consuming before construction begins). For the final draft, updates and information on these rule changes, please visit our webpage: dnr.mo.gov/env/hwp/ustchanges.htm.

New Installation Inspections

While the department has "upgraded" the new installation program to reflect the new construction standards, staffing is limited and this program is time and resource-consuming. The department is currently evaluating the new installation program and the department oversight of new installations to determine the most effective use of department time and resources.

Enforcement Efforts

In this time period, the Tanks Section referred 17 cases to the Underground Storage Tanks Compliance and Technology Unit for enforcement action. Of these, twelve were for financial responsibility violations, four were for underground storage tank closure violations and one was for remediation violations. Staff drafted five abatement orders for financial responsibility violations and two orders were sent for closure violations. In addition, five cases were resolved that had financial responsibility violations and two sites are in the process of closing their underground storage tanks. Staff also referred two sites to the Attorney General's Office for follow up legal action on previously entered consent judgments.

Special Facilities Unit

Commercial Facility Inspectors - Special facilities inspectors conducted 15 inspections of hazardous waste treatment, storage and disposal facilities.

Hazardous Waste Transporters - 101 hazardous waste transporter license compliance background checks were completed.

Hazardous Waste Enforcement Unit

Enforcement Efforts

- Resolved 10 hazardous waste enforcement cases
- Received two new enforcement cases

Pesticide Collection Activities

Staff conducted two pesticide collection events. An event ,held in Chillicothe on July 15, collected 13,106 pounds of waste pesticide from 39 participants. The last event of 2017, held in Lockwood on Oct 14, collected 10,103 pounds of waste pesticide from 54 participants.

Staff participated in pesticide applicator training at the Missouri Green Industry Conference in St. Charles on Nov. 29 by providing a presentation titled Pesticide Waste – Prevention, Disposal and Spills.

Pesticide Collection Events - The following pesticide collection events have been scheduled for 2018.

1. Portageville – March 10 – University of Missouri – Fisher Delta Research Center, 147 W. State Highway T, Portageville, MO 63873
2. Bethany – March 24 – Orscheln, 3810 Miller St., Bethany, MO 64424
3. Palmyra – May 19 – Palmyra Recycling Center, 810 W. Line St., Palmyra MO 63461
4. Perryville – June 23 – Perryville MFA, 3501 US-61, Perryville, MO 63775
5. Nevada – July 21 – Vernon County Fairgrounds, 1488 E. Ashland St., Nevada, MO 64772
6. Jefferson City – Sept. 8 – Jefferson City MFA, 1009 Fourth St., Jefferson City, MO 65101

Check out the Pesticide Collection Program webpage at: dnr.mo.gov/env/hwp/pesticide for fliers.

Annual Underground Storage Tank Sources and Causes Report

The Tanks Section's completed the Annual Public Record Report for the period of Oct. 1, 2016, through Sept. 30, 2017, in November 2017. The department has placed this report on the Tanks section website at dnr.mo.gov/env/hwp/tanks/tanks.htm. The report is located under the quick links and it will also be made available by request to those that do not have internet access.

The first section of the report describes the number of underground storage tank facilities, individual regulated tanks, compliance rates in Missouri and an individual breakdown of the sources and causes of releases opened in federal fiscal year 2017.

A total of 93 releases were opened at underground storage tanks in federal fiscal year 2017.

- Four instances of physical or mechanical damage to piping
- One instance of physical or mechanical damage to a tank
- Three physical mechanical damage releases to a dispenser
- One physical mechanical damage to a submersible turbine pump area
- One spill related to a delivery problem
- Five corrosion related releases
- Four spills or other issue
- Seventy-six historical releases (unknown source)

The unknown releases were discovered during tank closure, phase II investigations during property transactions, or other investigations but a definitive source or cause of release was not able to be determined. The website also includes reports on the sources and causes of UST leaks for previous years. The first report was completed in December 2008.

Tanks Section holds workshop at the Missouri Waste Coalition Conference

The Tanks Section held a Tanks Workshop on July 18, 2017, as part of the Missouri Waste Control Coalition Conference at the Tan Tar A Hotel at Lake of the Ozarks. This was the tenth annual workshop in conjunction with the Missouri Waste Control Coalition Conference. This conference was targeted toward environmental consultants who provide services to tank owners and operators. The conference provided consultants with information and training regarding light non-aqueous phase liquid conceptual site models; a Tanks Section update on new regulations; free product guidance, plume stability guidance and risk based corrective action issues; an evaluation of natural attenuation utilizing field instruments a demonstration of the department's Environmental Site Tracking and Research Tool (E-START) long term stewardship database/system; and a discussion on CalClean technology.

Tanks Accomplishments for 2017

- Tanks Section staff and Compliance and Enforcement staff participated in the ASTSWMO Mid-Year Meeting on April 2017, the UST Compliance and Prevention Workshop in May 2017, and the Annual Meeting in October 2017.
- Tanks staff completed participation on a workgroup for the International Technology and Regulatory Council on Petroleum Vapor Intrusion. The Tanks Section had a staff member join the ITRC Optimizing In Situ Remediation Performance and Injection Strategies Team.
- Compliance and Enforcement staff continue to be a member of the National Work Group on Leak Detection Evaluations.
- The Tanks Section continued participation on the ASTSWMO Emerging Fuels Task Force. This work group was tasked with assisting state and territories UST programs by providing resources and information related to managing storage and releases of new fuels in use or in development. The Compliance and Enforcement Section continued participation on the UST Task Force for ASTSWMO.
- The Compliance and Enforcement Section provided technical assistance at the annual PACE convention in Kansas City in February. This is an annual trade show that Missouri owned marketers and convenience store officials participate in.
- Continued an expedited review process ensuring that remediation reviews of high priority sites are completed in a timely manner.
- Continued an initiative on closing tank remediation sites that have been open for more than 20 years. The goal is to help provide additional information to the consultant to facilitate completion of these projects and help to achieve no further action status for these sites.
- The Compliance and Enforcement Section completed rulemaking for secondary containment and for the finalized federal underground storage tank rules. This became effective in May 2017.
- Developed a draft free product guidance for staff to train staff. This document will be finalized in 2018 after updates are completed on the ITRC LNAPL guidance, which will be incorporated into the Tanks Section guidance for staff.
- The Tanks Section continued to work on the Tanks Backlog Plan.
- In Doolittle, the Tanks Section/Missouri Geological Survey, conducted down hole video of the old well. The old well got properly abandoned and a new well was installed.
- The Budget and Planning Section continued to provide tracking of financial responsibility to identify all sites without financial responsibility. The Compliance and Enforcement Section continued to take actions to assure sites without financial responsibility would obtain coverage and to pursue penalties for sites that had not maintained financial responsibility. These actions helped maintain a high compliance rate of over 98% for facilities with acceptable financial responsibility.
- Continued to update tanks GIS data to conform with department standards and work to add tank facilities and cleanup sites to the department's Long Term Stewardship mapper. The mapper went live with tank sites in December 2016.
- Continued development of database enhancements and tracking systems.

- Remediation staff continued to utilize the tracking system in 2017. This system helps to ensure correspondence is dealt with in a prompt and consistent manner. This tracking system is directly linked to the mail log so as soon as the mail is received and entered the project manager is immediately notified.
- The Tanks Section continues to participate in a historic highways revitalization project and has identified several opportunities in Missouri for EPA Targeted Brownfields Assessments.
- The Tanks Section produced the 10th annual Public Record Report to the EPA in November 2017. This report includes the sources and causes of releases of tanks in Missouri.
- The Tanks Section continued to maintain an average turn-around time of 44 days that meets section goals.
- The Tanks Section was able to maintain a reduced turn-around time on closures of less than 14 days throughout much of 2017.
- The Compliance and Enforcement Inspection team conducted 138 new installation inspections. The inspection team also continues to maintain their training, often direct from the manufacturers, on proper installation of tanks, piping and other equipment.
- During calendar year 2017, the department accomplished the following work related to petroleum storage tanks:
 - Properly closed 571 tanks
 - Reviewed 132 closure reports
 - Approved 130 closure notices
 - Conducted two closure inspections
 - Conducted two site investigations
 - Responded to 11 emergencies involving petroleum releases
 - Oversaw completion of 165 remediation sites
 - Issued 195 certificates of registration
 - A total of 104 new releases were reported during calendar year 2017
 - Remediation staff received 1,744 remediation documents and generated 1,788 response letters
 - Staff were notified of 64 new installations at tank sites and received 47 new site registrations
 - Compliance and Enforcement Section staff resolved 79 cases involving violations
 - At the end of the 2017 calendar year, there were 93 active enforcement cases
 - Financial responsibility compliance was at 98.8 percent, reflecting insurance coverage from both PSTIF and other private policies and statements
 - The department currently regulates 3,381 facilities with 8,783 active underground storage tanks

The Tanks Section finalized, routed for review, signature, copied and mailed 1,788 documents. The section provided excellent customer service and helped section, program and department staff when necessary, and continued to review and modify existing procedures to ensure accuracy and efficiency.

The Compliance and Enforcement inspection review team conducted and/or reviewed 1,973 inspections (including new installations, re-inspections, site visits, complaint and other investigations, as well as standard compliance inspections) and sent more than 1,000 letters (including letters of warning and notices of violation) on underground storage tank inspections. This team also answers many equipment and operational site questions via telephone and email. The team also regularly provides technical assistance, public outreach, regulatory interpretations and equipment explanation to other department staff, other agencies, the regulated community, contractors, manufacturers and the general public.